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March 5, 2025

VIA ECF

The Honorable Sarah Netburn, United States Magistrate Judge
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001, Case No. 03 MDL 1570 (GBD)(SN)*
Accardi et al v. Islamic Republic of Iran, Case No. 21-cv-06247
Alexander et al v. Islamic Republic of Iran, Case No. 21-cv-03505
Betso et al v. Islamic Republic of Iran, Case No. 21-cv-01394

Requests for Corrections/Revisions to the Exhibits Attached to the Report and Recommendation, dated Feb. 28, 2025, ECF No. 10755

Dear Judge Netburn:

The undersigned, as the attorney for the Plaintiffs in the above-referenced actions, respectfully submits this Letter Motion to request that certain corrections/revisions be made to the Exhibits attached to the Report and Recommendation issued by the Court on Feb. 28, 2025, ECF No. 10755 ("R. & R."), which addressed Plaintiffs' motions for partial final judgment by default against Iran and for the award of certain damages, in the above-referenced actions.

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I. Plaintiff Margaret Randazzo-Maloy's Solatium Award Not Included in the R. & R. Exhibits

Margaret Randazzo-Maloy is a plaintiff in the above-referenced *Alexander* action, and the spouse of Decedent, Gene Edward Maloy, who was killed in the Attacks on September 11, 2001. R. & R. at 16. The R. & R. recommended awarding Plaintiff Margaret Randazzo-Maloy \$12.5 million in solatium damages. *Id.* However, it seems this award was inadvertently not included in the exhibits attached to the R. & R. It is therefore respectfully requested that the exhibits to the R & R be revised to include the recommended solatium award of \$12.5 million to Plaintiff Margaret Randazzo-Maloy.

II. Personal Representative, Sandra Heffernan's Last Name is Misspelled in Exhibit B

The last name of Personal Representative Sandra Heffernan is misspelled "Hefferman" in Exhibit B, line no. "10". It is respectfully requested that the spelling of her last name be corrected to read "Heffernan".

III. Decedent, Charles Williams's Last Name is Misspelled in Exhibit C

The last name of Decedent Charles Williams is misspelled "William" in Exhibit C, line no. "29". It is respectfully requested that the spelling of his last name be corrected to read "Williams".

Thank you for the Court's consideration of the above requests.

Respectfully submitted,



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